## 1 Brian D. Whelan, Esq. (SBN 256534) WHELAN LAW GROUP, A Professional Corporation 1827 East Fir Avenue, Suite 110 Fresno, California 93720 3 Telephone: (559) 437-1079 Facsimile: (559) 437-1720 4 E-mail: brian@whelanlawgroup.com 5 Attorneys for: Plaintiff JOEI HARRISON 6 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 JOEI HARRISON, Case No. 2:20-CV-01104-WBS-DMC 11 Plaintiff, STIPULATION ALLOWING 12 PLAINTIFF TO FILE AND SERVE v. HER FIRST AMENDED 13 COMPLAINT; AND ORDER PLANASA, LLC, et al., **THEREON** 14 Defendant(s). 15 16 WHEREAS, through counsel, Plaintiff JOEI HARRISON ("Plaintiff") has discussed 17 with counsel for Defendants PLANASA, LLC and PLANASA US HOLDINGS ("Defendants") the 18 need to file a first amended complaint to address changes to the law impacting the complaint and a 19 corresponding need to bring a motion to obtain an order granting leave to file a first amended 20 complaint; 21 WHEREAS, the parties through their counsel have met and conferred over the 22 23 proposed amendment and wish to avoid the time, trouble and expense associated with a motion for 24 leave to file the amended pleading, and the parties have therefore agreed to the following 25 stipulation: 26 27 28

## ase 2:20-cv-01104-WBS-DMC Document 12 Filed 11/06/20 Page 2 of 2 **STIPULATION:** 1 In consideration of all of the above, the parties to this action hereby stipulate and 2 3 agree that Plaintiff may file and serve her First Amended Complaint attached hereto as Exhibit "A" 4 and that Defendants shall have the statutory time period with which to respond in any code- of-5 civil-procedure compliant manner. 6 Dated: October 9, 2020 WHELAN LAW GROUP, 7 A Professional Corporation 8 /s/ Brian D. Whelan\_ By Brian D. Whelan, 9 Attorneys for Plaintiff JOEI HARRISON 10 11 Dated: October 9, 2020 WELLS, SMALL, FLEHARTY & WEIL 12 13 /s/ Mark Alan Vegh By Mark Alan Vegh, 14 Attorneys for Defendants PLANASA, LLC and 15 PLANASA US HOLDINGS, LLC 16 **ORDER** 17 Pursuant to the stipulation of the parties and good cause appearing therefor, 18 19 IT IS HEREBY ORDERED that Plaintiff may file and serve the proposed First 20 Amended Complaint within 10 days of the Court's execution of this order and Defendants shall 21 have the statutory period of time with which to respond in any code-of-civil-procedure compliant 22 manner. 23 Dated: November 6, 2020 24 WILLIAM B. SHUBB 25 UNITED STATES DISTRICT JUDGE 26 27

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